



MASON COUNTY COMMUNITY SERVICES

Building, Planning, Environmental Health, Community Health

Mason County Comprehensive Plan Public Comment Responses Fall 2017

Public Comment Summary and Responses (Spring 2015-Fall 2017)

Q. What is Mason County doing to protect water quality and quantity, including drinking water, in this Comprehensive Plan Update?

A. All water bodies, the National Wetland Inventory, aerial photos for interpretation of delineations, and Water Mitigation Planning Areas provided by Washington State Department of Ecology, and other critical areas are mapped as part of the Mason County Planning Map Library available on the County website at:
<https://gis.co.mason.wa.us/planning/>

Mason County has 92 square miles of water bodies including streams, saltwater inlets, lakes, ponds and wetlands. Some of the major water bodies include:

- Hammersley Inlet
- Hood Canal
- Lake Cushman
- Mason Lake
- Totten Inlet

Portions of four (4) watersheds are located in Mason County including: Kennedy-Goldsborogh (WIRA 14); Skokomish-Dosewallips (WIRA 16); Chehalis Basin (WIRA 22); Queets-Quinalt (WIRA 21)

Flood Damage Prevention Ordinance

The floodplain in Mason County includes the Skokomish River and Shelton Valleys, Tahuya and Union Rivers, and coastal velocity areas around Case Inlet and Hood Canal and covers over 87,000 acres. The location of floodplains and floodways in Mason County are mapped by the Federal Emergency Management Agency (FEMA). Mason County has adopted a revised Flood Damage Prevention Ordinance (MCC 14.22) in compliance with state and federal requirements as part of the Comprehensive Plan Update.

Critical Areas Ordinance, including Shoreline Master Program

Mason County has updated its Critical Areas Ordinance (MCC 8.52), including the Shoreline Master Program (SMP) in compliance with state and federal requirements as part of the Comprehensive Plan Update. Mason County has over 709 miles of shoreline that are protected by the Washington State Shoreline Management Act and by the Mason County Critical Areas Ordinance.

After addressing final public comment received through Washington State Department of Ecology's formal 30 day comment period, Ecology issued their approval of the County's updated Critical Areas Ordinance, including SMP in September 2017.

Additionally, policies in Chapter 2, Chapter 3, Land Use Element, Chapter 6, Capital Facilities Element, and Chapter 7, Utilities Element of the Mason County Comprehensive Plan support the County's efforts to protect water quality and ensure availability.

Q. How does Mason County protect Critical Aquifer Recharge Areas?

The Growth Management Act (GMA, [Chapter 36.70A Revised Code of Washington](#)) requires comprehensive land use planning by counties and cities. The environmental planning goal is to "protect the environment and enhance the state's high quality of life, including air and water quality, and the availability of water" ([RCW 36.70A.020](#)).

The GMA requires the designation and protection of "critical areas" to prevent harm to the community from natural hazards and to protect natural resources.

- **Natural hazards** are frequently flooded areas and geologically hazardous areas.
- **Natural resources** are wetlands, fish and wildlife habitat conservation areas, and "areas with a critical recharging effect on aquifers used for potable water," which are called Critical Aquifer Recharge Areas (CARAs).

The GMA defines CARAs as "areas with a critical recharging effect on aquifers used for potable water." The goal of establishing CARAs is to protect the functions and values of a community's drinking water by preventing pollution and maintaining supply.

Mason County, with technical assistance from Washington State Department of Ecology, has mapped critical aquifer recharge areas considered vulnerable and in need of protection, including sole source aquifers, potential sea water intrusion areas, wellhead protection areas, and areas within a half mile of surface water source limited streams. The maps are available on the Mason County website as part of the Planning Map Library.

The lands and fresh waters of Mason County meeting the critical aquifer recharge areas classification, plus three hundred feet beyond the mapped boundary of all critical aquifer recharge areas, are designated under RCW Chapter 36.70A as Critical Area Protection Zones requiring protection for public health. These areas are protected through policies and development permitting procedures as well as Mason County Code Enforcement efforts.

Mason County is in full compliance with all state and federal requirements related to protection of Critical Aquifer Recharge Areas throughout the County.

Additionally, policies in Chapter 2, Chapter 3, Land Use Element, Chapter 6, Capital Facilities Element, and Chapter 7, Utilities Element of the Mason County Comprehensive Plan support the County's efforts to protect water quality and quantity.

Q. How did Mason County develop the population forecast and population distribution in the Comprehensive Plan Update?

A. The Washington State Office of Financial Management provides high, medium and low population projections for counties and small areas across the state including Allyn and Belfair. These State estimates for population growth provide the foundation for Mason County's comprehensive Plan. Mason County used the medium range population projection developed by the State Office of Financial Management as required by State Law (RCW 36.70A.110 & RCW 36.70A.115).

Additionally, Mason County incorporated the City of Shelton's population forecast for both the Urban Growth Area of Shelton and the incorporated City of Shelton. **See Shelton's Official Population Forecast attached.**

Q. How did Mason County reach out to engage the residents and citizens in the Comprehensive Plan?

In 2015, Mason County developed a Public Participation Plan to use when updating the Comprehensive Plan. This plan is available on the County website at:
<http://www.co.mason.wa.us/community-services/planning/2036-comp-plan-update/index.php>

Throughout the Plan development process, Mason County has followed all requirements established in State law (RCW 36.70A) and County Code (MCC 15.07) for public participation and notification including mailings related to re-zone applications, posting notices of rezone applications, newspaper hearing notices for all public meetings, and continual posting of updates on our website and social media.

We opened the formal public comment period on September 12, 2017 and continued to collect public input through online surveys, community “coffee talks”, outreach to homeowners’ associations, and through our website, emails, and phone conversations.

Starting in summer of 2017, Mason County conducted a three question public survey to validate the concerns and issues raised since the beginning of the Comprehensive Plan Update. The County collected over 70 independent responses. The 2017 survey responses can be found on the Mason County website.

In summary, Mason County Planning Commission has held 44 public meetings including two joint meetings with the Board of County Commissioners and Planning Commission members. We have continually accepted public comment on all aspects of the Comprehensive Plan from the Scope to the final draft since March of 2015.

The Mason County Comprehensive Plan website as had over 400 independent views since it was first posted in April 2017 and the Planning Map Library has had over 60 views over the past month, since it was first posted in September 2017.

Lastly, the County has a historic record includes letters from citizens compiled and addressed from Spring 2015 to the opening of the official comment period. These are available upon request.

The public comments submitted during the 60-day comment period that opened in September 2017 are available on the Mason County website at:

<http://www.co.mason.wa.us/community-services/planning/2036-comp-plan-update/index.php>

MEMORANDUM

DATE: June 19, 2017

TO: Paula Reeves, Mason County Planning Manager

FROM: Mark Ziegler, City of Shelton Community Development Director

RE: Mason County Population Allocations

Population Allocations

As part of the comprehensive plan update process, counties are tasked with adopting a **population forecast** based on estimates made by the Washington State Office of Financial Management (OFM) and allocating population growth in that forecast based on the countywide planning policies. **Population allocation** is a political decision that involves negotiation between jurisdictions and planning agencies in each county. Once population allocations are determined, cities adopt the allocation as their **growth target**, or the number of people and households that a city must accommodate in its comprehensive plan.

Population forecasts are one aspect to be considered in determining population allocation. However, the allocation should also align with the goals and objections for future growth, as determined by the countywide planning policies and confirmed in city and county comprehensive plans. The Growth Management Act (GMA) challenges counties and cities to plan for communities that meet its thirteen goals. This often involves planning for a future that alters existing trends. Communities demonstrate that they have the capacity to support this vision of the future through planning for land use, transportation, capital facilities, and other measures to support the population allocation.

Some of the factors to be considered in population allocation include:

- Population forecast – based on past performance, how much growth could be expected?
- Policy direction – are there plans and policies that support growth in this area?
- Growth plans – does the city have the infrastructure to support growth?
- Emerging trends – are there new or changed circumstances that could affect growth trends?

Population Forecast

Population forecasting is a way of examining past trends and projecting them into the future. Population forecasting is a one piece of information that is used in determining the appropriate population allocations for the County.

Mason County offers the population forecast in Figure 1. A forecast is a prediction of future growth. The mathematical explanation behind this forecast is not entirely clear. It could be based upon assuming the medium growth population estimate from OFM for 2036 (81,616) and dividing that up, or it could be

potentially based on a rough growth rate calculation based on past performance. It is difficult to know without further explanation of the methodology.

Figure 1 - Proposed Population Forecast for Mason County

MASON COUNTY AND URBAN GROWTH AREA 20 YEAR POPULATION FORECAST				
	2016 Population	2036 Population	Population Increase	% Increase 2016-2036
Mason County Total	62,320	83,790	21,470	34%
City of Shelton	10,070	16,200	6,130	61%
Shelton UGA	3,740	7,220	3,480	93%
Urban Growth Areas (Allyn, Belfair)	3,000	4,730	1,730	58%

Shelton proposes an alternative population forecast based on average annual growth rate.

Figure 2 calculates a population forecast based on observed trends 2000-2016.

Figure 2 – Population Forecast Based on Observed Trends 2000 - 2016

	Populati on 2000	Populati on 2016	% change 2000-2016	CAGR 2000-2016	Populatio n Forecast 2036	Increase 2016- 2036	% growth 2016-2036
Mason County	49,405	62,320	26%	1.56%	84,938	22,618	36%
Shelton City	8,442	10,070	19%	1.18%	12,739	2,669	27%
Shelton UGA	3,309	3,746	13%	0.83%	4,420	674	18%
Allyn	1,034	1,996	93%	4.48%	4,797	2,801	140%
Belfair	789	1,007	28%	1.64%	1,394	387	38%
UGAS Total	5,132	6,749	32%	1.84%	10,611	3,862	57%
Rural Area	35,831	45,501	27%	1.61%	61,588	16,087	35%

There are a couple differences between Figure 1 and

Figure 2 :
To ensure transparency, in

- Figure 2 population is added for the year 2000¹ to look at both the simple growth rate (% change) and the annual growth rate (CAGR).²
- The annual growth rate shows how much growth occurred each year during the 16 year period. The annual growth rate then allows us to extend that rate out over a 20-year period to obtain a forecast. In this case, the compound annual growth rate (CAGR) is used for accuracy.³

¹ For the geographies studied, population estimates are not available for the period prior to 2000 for the UGAs. As a result, this analysis can only use data from 2000-2016.

² Simple Growth Rate – The rate at which growth occurs over a period of time. This rate is a simple percentage based on a starting value and ending value. Growth rates cannot be compared unless they occur over the same period of time. For example, comparing a growth rate calculated over a sixteen-year period to a growth rate calculated over a twenty-year period would not provide an accurate comparison.

³ CAGR is used instead of a simple average. Although both an average and a CAGR are mathematically correct, the CAGR more accurately represents growth and is a more precise tool for extrapolating future growth. A good explanation of the mathematics to support this assertion can be found here: <http://www.investopedia.com/articles/investing/041114/most-accurate-way-gauge-returns-compound-annual-growth-rate.asp>. Although this resource uses examples from the world of investing, the same mathematics apply for any growth scenario.

Figure 3 – Population Forecast Based on Observed Trends 2000 – 2007 (Prior to Great Recession)

	Population 2000	Population 2007	% change 2000-2007	CAGR 2000-2007	Population Forecast 2036	Increase 2016-2036	% growth 2016-2036
Mason County	49,405	59,536	21%	3.16%	116,053	56,517	95%
Shelton City	8,442	9,667	15%	2.28%	15,819	6,152	64%
Shelton UGA	3,309	3,524	6%	1.05%	4,621	1,097	31%
Allyn	1,034	1,712	66%	8.77%	10,718	9,006	526%
Belfair	789	943	20%	3.02%	1,825	882	93%
UGAS Total	5,132	6,179	20%	3.14%	17,163	10,984	178%
Rural Area	35,831	43,690	22%	3.36%	83,071	39,381	90%

Growth during the period 2000-2016 was stalled throughout the county, state, and country due to the Great Recession.

Figure 3 looks at growth rates in Mason County from the period before the Great Recession.⁴ When the growth rates in

⁴ Noted by Wikipedia, the Great Recession started in December 2007.

Figure 3 are compared with those in

Figure 2, the numbers reveal what is widely known – that the Great Recession halted growth and development in Mason County as it did in many places. There are many indicators that the economy is returning to pre-recession performance levels. Application of the pre-recession growth rate is a more reliable indicator for population projection than the rates that include the economic collapse.

Policy Direction

If Shelton and the county UGAs have historically had lower rates of growth than the county rural area, then why have these areas been traditionally given a larger share of the population allocation?

Population allocation is not the same as the projected or forecast growth. Population allocations are a policy statement on how growth should occur in the County over the next 20 years. Growth trends and forecasts are an important part of the allocation process. However, a simple extension of a growth trend may not reflect the future that the County wishes to create for itself. That is why population allocations consider policy direction. Policy direction may come from: the Growth Management Act and other state laws, Countywide Planning Policies (CWPPs), and the county and city comprehensive plans.

In Chapter IV, Mason County's current Comprehensive Plan (2005) lays out its population allocation policy. It analyzes historic growth trends, current trends, and future projections of growth. The allocation is based on the following:

- Adopts a projection between the OFM Medium and OFM High series population projection for the County
- Shelton has traditionally experienced lower rates of growth than the unincorporated county area
- The County should plan for long-term impacts of seasonal population increases that may not be reflected in growth figures
- UGAs should be sized to accommodate 25% greater growth than projected
- Population is allocated as shown in :
- Figure 4:

Figure 4 – Population Allocations 2005 -2025 from the Mason County Comprehensive Plan

TABLE IV.2-15: Area Growth Projections for Mason County 2005 - 2025		
Area	Share of Growth	Additional Population
Shelton Urban Growth Area	33%	10,500
Belfair Urban Growth Area	18%	5,600
Allyn Urban Growth Area	7%	2,250
Fully Contained Community Reserve	3%	1,000
RAC - LAMIRDS	1.5%	469
Rural Lands	37%	11,480
Total County	100%	31,299

Chapter II of the Mason County Comprehensive Plan supports this policy allocation through the CWPPs, which prioritize the assignment of growth to UGAs where infrastructure exists, is planned, and can reasonably serve development (CWPP 1.1, CWPP 3.8). Policies also encourage the placement of growth into UGAs if they can support mixed use development, multi-family development, and employment centers (CWPP 3.8). These policies are consistent with the Growth Management Act (GMA).

Shelton has had an increasing share of population allocation since the first GMA mandated Comprehensive Plan.

- 1995 plan gave Shelton (UGA and City limits) a 27% population allocation (which would result in a total population of 17,782 in 2014). Rayonier, a major employer, left Shelton in the 1980s, causing economic decline for two decades. This allocation was intended to support a “reverse the trend” policy of economic development and investment.
- In 2007, population growth was on track to achieve the 1995 plan goal at 13,191 for the City limits and UGA. The city had invested in infrastructure to support new growth and the Shelton Hills development was on the horizon. The allocation in the 2005-2025 planning period was increased to a 33% share of growth (which would result in a total population of 21,748) to reflect both the strong growth trend and future growth planning. This reflected an annual growth rate (CAGR) of 3.53% and strongly emphasized the continuation of the trend toward growth within the Shelton urban area.

Most Washington counties plan for an urban-rural split in population allocations that heavily favors the urban area. Some counties do this because it reflects current trends, but in others, such as Kitsap and Whatcom, it does not. Kitsap County has a 78% urban and 22% rural split, which allocates greater population growth to the urban area than either existing conditions or trend data. Similarly, Whatcom County assigns an 84% share to the urban area. These allocations are supported in Whatcom and Kitsap County by planning policies and investments intended to reverse current trends, comply with county policies, and meet the goals of GMA.

Growth Plans

Many communities around the state have assumed the resumption of pre-recession levels of growth in their Comprehensive Plans. Often this is seen in a 2036 growth target similar to the target adopted for 2026⁵. Such communities planned for a certain amount of growth, adopted planning policies to support such growth, and built utilities and infrastructure to support such growth. Growth Management supports planning for growth where there is existing or planned infrastructure to support such growth, typically in urban areas.

Shelton has been planning for growth that would “reverse the trend” since 1995, but has planned for significant growth in the last ten years. Until the Great Recession, growth in the city was consistent with the population allocation it received from the County, but fell to 0.51% (CAGR) in the years following the recession. Shelton has already planned for the resumption of pre-recession levels of growth in the following ways:

- Nearly 60 million dollars of investment in water and sewer utility upgrades since 2008 in anticipation of increased development identified in the City of Shelton Comprehensive Plan as follows:
 - **Sewer Basin 2 Rehabilitation.** In 2008 the City of Shelton replaced approximately 14,000 lineal feet of sewer main and replaced every lateral (to the cleanout) in the aging sewer basin as an Inflow and Infiltration (I and I) abatement project. The abatement of I and I “frees” up additional wastewater capacity through elimination of stormwater seepage into the City’s Utility lines and system. The total cost of the rehabilitation was \$3,902,134.
 - **Sewer Basin 3 Rehabilitation (Design Completed).** In 2016 the City of Shelton began engineering design for the replacement of approximately 35,000 lineal feet of sewer main and laterals in Sewer Basin “3”. This project is a continuation of I and I work the City has been performing to improve the operation of its wastewater treatment plant. This project is expected to go out for construction bid in the Summer of 2017 and carries an Engineering estimated cost of construction at: \$7,600,000.
 - **Sewer Basin 5 Rehabilitation.** In 2013 the City of Shelton replaced approximately 77,600 lineal feet of sewer main and replaced every lateral (to the cleanout) in the aging sewer basin as an Inflow and Infiltration (I and I) abatement project. The total cost of rehabilitation was \$8,478,513.
 - **Construction of a Satellite Wastewater Treatment Plant.** In 2010 the City of Shelton completed construction of a Satellite Wastewater Treatment Plant just south of Sanderson Field. The plant is designed to initially treat 400,000 gallons per day of wastewater though is designed in a “package” format and can be easily doubled or tripled in capacity. It was constructed to serve anticipated development in the Northwest portion of the City and its Urban

⁵ Required updates around the states all have 20 year planning horizon, but reviews were required to be completed on different timelines.

Growth Area. Total cost of the plant (phase I) was \$11,461,668.

- **Total Rehabilitation/Reconstruction of the City of Shelton Main Wastewater Treatment Plant (including reconstruction of the City’s main wastewater pump station and construction of a new wastewater pump station).** The City completed this work in 2012. The project included new headworks screen, addition of the ability to produce Class “A” Biosolids, an additional clarifying tank (to allow for maintenance shutdowns), a “slack” tide holding tank, and Ultraviolet treatment of wastewater. The project was a wholesale improvement to the treatment of sewage and optimized the plants 10,000,000 gallon per day treatment capacity to current standards. Total cost was \$20,563,057.
- **Lake Boulevard Sewer Main Installation.** This project, completed in 2016 in conjunction with the Lake Boulevard/Pioneer Way street improvement project, installed 4,559 lineal feet of new sewer main to serve the south portion of City Limits (previously unserved by sewer). Total cost was just over \$400,000.
- **Northcliff Road Water and Sewer Main Installation.** This project, completed in 2008 in conjunction with the Northcliff Road street improvement project, installed 1,820 lineal feet of new water main and 2,600 lineal feet of new sewer main. Total cost was approximately \$500,000.
- **Regional Water and Wastewater Conveyance and Reclaimed Pipelines Project.** This project, completed in 2008, installed 22,000 lineal feet of Sewer Main and 25,000 lineal feet of reclaimed water main, to serve the Port of Shelton and northwestern portion of City limits and the Shelton Urban Growth Area near the Airport, Washington State Patrol Academy, and Washington Corrections Center. Total cost was \$3,808,569.
- **Shelton Springs Road Watermain and water pressurization project.** This project, completed in 2012, extended 11,700 lineal feet of municipal (potable) drinking water main from City limits (near the high school) out Shelton Springs Road to the Washington State Patrol Academy and the northwestern Urban Growth Area. Total cost \$2,474,151.
- **John’s Prairie Road Water Main Installation.** This project was completed in 2012 and installed a water main from North 13th Street east to the new PUD #3 facility. The water line is intended to serve (primarily) future development in the City of Shelton Urban Growth Area in the northeast portion of UGA limits. Total cost was \$1,780,683.
- **Upper Mountain View Watermain Project Phase 1A.** The project, completed in 2016, installed 1,769 lineal feet of watermain, installed a 400,000 gallon elevated water tank, and helped serve the WSP academy and is intended to serve future development in the Northwestern Urban Growth Area. Total cost was \$3,213,329
- **Upper Mountain View Watermain Improvement Project Phase 1B.** The project, completed in 2016, installed 3,270 lineal feet of new watermain to provide “looped” water availability and additional pressure/storage for the new upper mountain view pressure zone intended to serve the northern City limits and the City’s northern Urban Growth Area. Total cost was \$870,130.
- **Angleside Booster Pump Station.** The project, completed in 2016, increased water storage capacity for the southern water pressure zone of the City and its UGA. Total cost was

\$274,129

- 2010 Water Comprehensive Plan and 2013 Sewer Comprehensive Plan were based on pre-recession growth rates and in anticipation of increased development and anticipate continued investment in the expansion of the City’s utilities.
- A Planned Action and Environmental Impact Statement have been approved/issued for the Shelton Hills development. The project is anticipated to create over 1.3million square feet of new commercial development and over 1,800 residential units. The project is anticipated to build out over the planning period (2016-2036).
 - Shelton Hills is a catalyst project that increases the average density in Shelton for residential uses and introduces mixed-use development and is anticipated to spur “spin off” development in other areas of the City and UGA.
- New employment opportunities with state of the art lumber mill on Shelton’s waterfront that is slated for full operation in 2017. With continued investment in the millsite the City and UGA will see additional support industry start/continue.
- The City has adopted traffic impact fees, a road sales tax, and a transportation management district to fund roadway improvements that will work to benefit and encourage additional development and investment within City limits that will benefit and encourage renewed and continued investment within and around the City of Shelton.
- Mason General Hospital expansion and update now provides regional scale health care as identified in the City of Shelton and Mason County Comprehensive Plans.
- Olympic College has expended its Shelton Campus to include more vocational training programs demonstrating renewed investment in their Shelton Campus.
- Shelton has invested in revitalization of its downtown, including analysis of multi-modal improvements along the Railroad Avenue corridor in an effort to encourage continued development in the downtown core.
- Local school bond approved in 2017 will provide a \$65 million investment in Shelton School District and work to refresh the districts already diverse assets and facilities.

Emerging Trends

A recent Washington State Supreme Court decision in the case of Whatcom County v. Hirst, Futurewise, et al (*Hirst*) has potential implications for population allocation in most counties, but particularly counties with growing rural areas. In the *Hirst* case, the Supreme Court identified County responsibilities under GMA, including:

- The County's Comprehensive Plan must include measures to protect surface and groundwater resources. Comprehensive plans “shall provide for protection of the quality ... of groundwater used for public water supplies.” [RCW 36.70A.070\(1\)](#) (emphasis added). It is a goal of the GMA to “[p]rotect the environment and enhance the state’s high quality of life, including air and water quality.” [RCW 36.70A.020\(10\)](#) (emphasis added).

- The GMA requires counties to ensure an adequate water supply before granting a building permit or subdivision application. The GMA places an independent responsibility to ensure water availability on counties, not on Ecology. The GMA requires that an applicant for a building permit for a single-family residence or a development must produce proof that water is both legally available and actually available.
- Counties must regulate to ensure land use is not inconsistent with available water resources. Patterns of land use and development in rural areas must be consistent with protection of instream flows, groundwater recharge, and fish and wildlife habitat. A county's Comprehensive Plan rural lands provision must include measures governing rural development to protect water resources.

In light of the *Hirst* decision counties bear a greater responsibility to ensure adequate water supply for new growth than previously understood. The allocation of significant population growth to the rural area should match the actual availability of water in the rural area. Counties must adjust their land use to protect water resources, including instream flows. One of the implications of the *Hirst* case is that development of the rural area may not occur as easily, or following the existing trend, due to increased requirements to prove the adequacy of water quantity and water quality. On the flip side, this makes growth more likely to occur in cities where water rights are already established and there is adequate capacity for growth.

Proposed Growth Allocation for Shelton

Based on the resumption of pre-recession growth patterns, emerging trends, and infrastructure investments, the City proposes the following growth allocation for Shelton for 2036 in

Figure 5:

Figure 5 – Proposed Growth Allocation for the City of Shelton 2016 – 2036⁶

	2016 Population	2036 Population	Population Increase	% Increase 2016 - 2036
Mason County Total	62,320	81,674	19,354	31%
City of Shelton	10,070	16,200	6,130*	61%
City of Shelton UGA	3,746	7,216	3,470**	92%
UGA (Allyn and Belfair)	2,984	3,984	1,000	33%
Rural County	45,520	54,274	8,754	19%

*Assumes buildout of the Shelton Hills Planned Unit Development within the planning horizon. The development includes approximately 1,800 residential units and 1.3 million square feet of commercial industrial development. Total population capacity within City limits is estimated utilizing a very conservative analysis method that includes a much more dense development pattern than currently exists throughout the City.

**Assumes buildout of the proposed “Goldsborough Heights” UGA expansion area request by Green Diamond Resources as part of their development retirement/consolidation plan currently ongoing within Mason County.

Summary

- Historic growth trends must be examined carefully to ensure that the most effective and accurate methods of comparison are used.
- Population forecasts based on historic trends only reveal part of the picture. It’s difficult to account for the Great Recession, emerging trends, policy direction, or changed circumstances.
- Population allocations are a policy decision that involve many factors including: community policies and priorities, emerging trends, and looking at patterns of investment.
- Shelton’s growth was on-track with county policy allocations prior to the Great Recession. A forecast based on the extension of the 2000-2016 trend would not provide enough allocation for the growth that Shelton has already planned.
- Shelton has already made significant investments in utilities and infrastructure to support future growth of the City and its urban area.
- GMA and the CWPPs support the allocation of growth to urban areas that have utilities and infrastructure that can serve it.
- Shelton proposes a population allocation of 6,130 to the city and 3,470 to its UGA in light of these considerations.

⁶ Proposed Growth Allocation for the City of Shelton 2016-2036 based on the medium growth projection developed by the Washington State Office of Financial Management (allocations for County UGA’s and Rural Areas are provided simply for representation, not to imply how Mason County should allocate growth)